

# Sage Legal LLC

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October 22, 2025

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Nusrat J. Choudhury, U.S.D.J.  
100 Federal Plaza, Courtroom 1040  
Central Islip, NY 11722-4438

**Re: Deo, *et al.* v. Baron, *et al.***  
**Case No.: 2:24-cv-6903 (NJC) (JMW)**

Dear Judge Choudhury:

This office represents Defendant Superb Motors Inc. (“Superb”) and Bruce Novicky (“Novicky”) in the above-referenced case. Superb and Novicky write, together with the remaining Defendants, to jointly and respectfully request an extension of time of two (2) weeks to oppose Plaintiffs’ motion to remand.

**Legal Standard**

Rule 6 of the Federal Rules of Civil Procedure (hereinafter referred to as “Rules” or “Rule”) provides that “[w]hen an act may or must be done within a specified time, the court may, for good cause, extend the time ... with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expire.” See Fed. R. Civ. P. 6(b)(1)(A).

**Good Cause Exists for this Court to Exercise its Discretion in Favor of an Extension of Time**

Consistent with ¶ 1.7.1 of this Court’s Individual Rules for Civil and Criminal Cases, Superb and Novicky respectfully submit that: (i) the reason for this request is because your undersigned<sup>1</sup> is preparing for trial in Felberbaum v. Felberbaum, Case No.: 7:24-cv-2333 (PMH) (VR) before the Hon. Phillip M. Halpern, U.S.D.J. which is scheduled to take place on Monday, October 27, 2025 and Tuesday, October 28, 2025 and needs additional time to prepare opposition to Plaintiffs’ motion to remand; (ii) the original date Superb, Novicky, and the remaining Defendants have to oppose Plaintiffs’ motion to remand is Tuesday, October 28, 2025 (iii-iv) there have been no previous requests for an extension of this deadline; (v) Plaintiffs consent so long as they receive three (3) weeks to file reply papers, which Defendants consent to; and (v) Defendants seek a deadline of Tuesday, November 11, 2025 to submit opposition papers.

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<sup>1</sup> So as not to burden this Court with duplicative filings, the Defendants are working together to determine whether any Defendants that oppose remand can submit a single memorandum of law addressing their arguments in opposition to Plaintiffs’ motion to remand. As a result, all Defendants respectfully request that they, too, receive the same extension of time Superb and Novicky seek.

Hon. Nusrat J. Choudhury, U.S.D.J.  
United States District Court  
Eastern District of New York  
October 22, 2025  
Page | 2

For the foregoing reasons, Superb, Novicky, and the remaining Defendants respectfully submit that sufficient good cause exists to warrant this Court's exercise of discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(A).

The Defendants thank this Court for its time and attention to this matter.

Dated: Jamaica, New York  
October 22, 2025

Respectfully submitted,

**SAGE LEGAL LLC**

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**VIA ECF**  
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